

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

ANDREA OWENS,

Debtor.

No. 11-48528

OBJECTION TO AMENDED
EXEMPTIONS

Kathryn A. Ellis, the Chapter 7 Trustee herein, hereby objects to the amended
exemptions of the debtor as described below:

1. To the extent that the debtor is attempting to claim an exemption in excess of the
value permitted by federal or state law, the Trustee objects to the assertion of such an exemption;

2. To the extent that the debtor is attempting to claim an exemption for property for
which no exemption is permitted under federal or state law, the Trustee objects to the assertion
of such an exemption, including but not limited to the debtor's claim of exemption in an
undisclosed medical product liability claim as a personal injury claim pursuant to 11 U.S.C. §
522 (d)(11)(D) where her damages may be for other than "personal bodily injury" and may also
include pain and suffering;

3. To the extent that the debtor does not describe an asset or other item of property
for which an exemption is claimed with particularity, the Trustee objects to the assertion of such
an exemption;

4. To the extent that the actual value of an asset exceeds the valuation of the asset by
the debtor, the Trustee objects to the claim of any exemption; and

5. To the extent that the debtor has not provided information and/or documentation to the Trustee and/or have failed to cooperate with the Trustee regarding the investigation of her financial affairs and/or concealed any property, the Trustee objects to any claims of exemption by the debtor.

The Trustee is objecting, in part, to preserve her rights to object pending receipt of more information about the debtor's assets. The Trustee reserves the right to assert any other basis for her objection or otherwise amend this objection as she may determine to be appropriate at a later date.

DATED this 8th day of August, 2019.

By: /s/ Kathryn A. Ellis

Kathryn A. Ellis, Trustee

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